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11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 vs.

16 TREVIONNE WILLIAMS, KEITH BELL, and
17 **DENZEL CAMPBELL,**

18 Defendants.

Case No.: 2:17-cr-00180-JAD-PAL

**STIPULATION AND ORDER TO
CONTINUE MOTIONS DEADLINES
ONLY (FOURTH REQUEST)**

19 IT IS HEREBY STIPULATED by and between Defendant, **Denzel Campbell**, by and
20 through his counsel Paola M. Armeni, Esq., Defendant, **Trevionne Williams**, by and through his
21 counsel Michael J. Miceli, Esq., Defendant, **Keith Bell** by and through his counsel Jess R.
22 Marchese, Esq., and the Plaintiff, **United States of America**, by and through counsel Dayle
23 Elieson, United States Attorney, and Richard Anthony Lopez, Assistant United States Attorney,
24 that the Pre-trial Motion deadline date scheduled for September 20, 2018, be vacated and
25 extended in accordance with the parties' agreement below.

26 **IT IS FURTHER STIPULATED AND AGREED** that the parties herein shall have up
27 to and including October 4, 2018, within which to file any and all Pre-trial Motions and Notice
28 of Defense.

IT IS FURTHER STIPULATED AND AGREED that the parties herein shall have up
to and including October 18, 2018, within which to file any and all responsive pleadings.

...

...

1 **IT IS FURTHER STIPULATED AND AGREED** that the parties herein shall have up
2 to and including October 22, 2018, within which to file any and all replies to dispositive motions.

3 This Stipulation is entered into for the following reasons:

- 4 1. The Pre-trial Motion deadline was September 20, 2018.
- 5 2. Defense counsel needs additional time to make a final determination if any pre-trial
6 motions are necessary or if the matter can be resolved without pretrial motions.
- 7 3. The extension will allow the parties to meet the deadlines or resolve their cases.
- 8 4. Denzel Campbell, Trevionne Williams, and Keith Bell, have appeared in this case are not
9 in custody and along with the government agree to a continuance.
- 10 5. Plea Agreements were filed on behalf of the other co-defendants.
- 11 6. The additional time requested herein is not sought for purposes of delay and the denial of
12 this request for a continuance could result in a miscarriage of justice.
- 13 7. For all the above-stated reasons, the ends of justice would be best served by the
14 continuance of the deadlines of pretrial motions.
- 15 8. This is the fourth request for an extension of time to file pre-trial motions.

16 DAYLE ELIESON
17 UNITED STATES ATTORNEY
18 DISTRICT OF NEVADA

GENTILE CRISTALLI
MILLER ARMENI SAVARESE

19 DATED this 21st day of September, 2018.

DATED this 21st day of September, 2018.

20 /s/ Richard Anthony Lopez
21 RICHARD ANTHONY LOPEZ
22 Assistant United States Attorney
Attorneys for Plaintiff,
UNITED STATES OF AMERICA

/s/ Paola M. Armeni
PAOLA M. ARMENI
Attorney for Defendant,
DENZEL CAMPBELL

23 LAW OFFICE OF JESS R. MARCHESE

PITARO & FUMO, CHTD

24 DATED this 21st day of September, 2018.

DATED this 21st day of September, 2018.

25 /s/ Jess R. Marchese
26 JESS R. MARCHESE
27 Attorney for Defendant,
KEITH BELL

/s/ Michael J. Miceli
MICHAEL J. MICELI
Attorney for Defendant,
TREVIONNE WILLIAMS

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

Case No.: 2:17-cr-00180-JAD-PAL

4 Plaintiff,

5 vs.

6 TREVIONNE WILLIAMS, KEITH BELL, and
7 DENZEL CAMPBELL,

8 Defendants.

9 **FINDINGS OF FACT, CONCLUSION OF LAW AND ORDER**

10
11 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
12 Court hereby finds that:

13 **CONCLUSIONS OF LAW**

14 Based on the fact that counsel has agreed to a continuance, the Court hereby concludes that:

- 15 1. The Pre-trial Motion deadline was September 20, 2018.
- 16 2. Defense counsel needs additional time to make a final determination if any pre-trial
17 motions are necessary or if the matter can be resolved without pretrial motions.
- 18 3. The extension will allow the parties to meet the deadlines or resolve their cases.
- 19 4. Denzel Campbell, Trevionne Williams, and Keith Bell, have appeared in this case are not
20 in custody and along with the government agree to a continuance.
- 21 5. Plea Agreements were filed on behalf of the other co-defendants.
- 22 6. The additional time requested herein is not sought for purposes of delay and the denial of
23 this request for a continuance could result in a miscarriage of justice.
- 24 7. For all the above-stated reasons, the ends of justice would be best served by the
25 continuance of the deadlines of pretrial motions and trial date.
- 26 8. This is the fourth request for an extension of time to file pre-trial motions.
- 27 9. The ends of justice are served by granting said continuances and outweigh the best
28 interest of the public and the Defendant's right to a speedy trial, since the failure to grant said

1 continuances would be likely to result in a miscarriage of justice, as it would deny the parties
2 herein sufficient time, and the opportunity, within which to effectively and thoroughly prepare
3 and file pretrial motions, responses, and replies, and prepare for trial taking into account the
4 exercise of due diligence.

5 **ORDER**

6 **IT IS HEREBY ORDERED** by and between the parties herein, the deadlines for filing
7 any and all pre-trial motions are hereby due on or before the 4th day of October, 2018.

8 **IT IS FURTHER ORDERED** that the deadlines for filing of responsive pleadings, are
9 hereby due on or before the 18th day of October, 2018.

10 **IT IS FURTHER ORDERED** that the deadlines for filing of responsive pleadings are
11 hereby due on or before the 22nd day of October, 2018.

12 **IT IS SO ORDERED.**

13 DATED this 27th day of September, 2018.

14 Nunc pro tunc: 9/20/2018.

15 
16 **JENNIFER A. DORSEY**
17 **UNITED STATES DISTRICT COURT JUDGE**
18 **CASE NO.: 2:17-cr-00180-JAD-PAL**
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